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In the matter of

PR Docket 93-85

28 June 1993
510 East Wistaria Avenue
Arcadia, California 91006

Office of the Secretary
Federal Communications Commission
1919 M Street Northwest
Washington, D. C. 20554

Commissioners:

I write to urge adoption of Proposed Rulemaking Docket 93-85 concerning rules for the Amateur Service, and to point out two issues which I believe were overlooked by the Private Radio Bureau staff when creating the revised definition of *repeater operation* for incorporation into Section 97.3(a) of the Amateur Service rules.

The proposed definition restricts repeater operation to (in part) angle-modulated (frequency-modulated and phase-modulated) voice communication systems. Here in Southern California there are already several VHF repeaters in the Amateur Service using amplitude companded single sideband (ACSSB) modulation. I do not think it was the intent of the staff of the Commission to terminate these systems, nor was there intent to deny more spectrally efficient modulation techniques such as ACSSB to radio amateurs. I therefore request that references to a specific modulation technique for voice repeater systems in the Amateur Service be omitted from this definition so as to permit the broadest possible range of experimentation and to allow the adoption of new modulation formats as they become available.

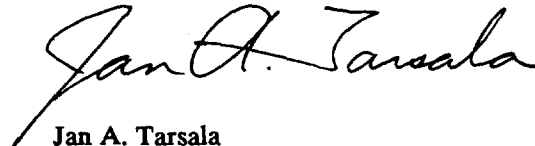
The proposed definition of *repeater operation* also specifies that such a station "instantaneously retransmit

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the signals of another amateur station. The Commission should make clear that this is not meant to preclude the use of audio delay lines within amateur radio repeaters for, among other purposes, the elimination of squelch tails and the suppression of audio feedback in full duplex configurations. A discussion of this issue in the Report and Order should be sufficient to clarify this matter without a change in the specific language proposed for Section 97.3(a).

I thank the Commission for this opportunity to participate in the rulemaking process and for its consideration of my comments.

Respectfully submitted,

A handwritten signature in black ink, reading "Jan A. Tarsala". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jan A. Tarsala

Licensee of Amateur Radio Station WB6VRN and
Trustee for Amateur Radio Club Station W6VIO at
the Jet Propulsion Laboratory, Pasadena, California